

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 7
MLCJR LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 23-90324 (CML)
Debtors.	)	(Jointly Administered)
	)	

**LIMITED OBJECTION OF GOM SHELF, LLC TO  
TRUSTEE’S EMERGENCY MOTION FOR AUTHORITY TO (A)  
RELINQUISH CERTAIN FEDERAL LEASES; (B) ABANDON THE REMAINING  
TITLE TO CERTAIN FEDERAL LEASES; AND (C) FOR RELATED RELIEF  
[Relates to Docket No. 2341]**

GOM Shelf, LLC (“GOM”) asserts the following limited objections (collectively, the “Objection”) to the *Trustee’s Emergency Motion for Authority to (A) Relinquish Certain Federal Leases; (B) Abandon the Remaining Title to Certain Federal Leases; and (C) for Related Relief* [Docket No. 2341] (the “Motion”) filed herein by Michael D. Warner, solely in his capacity as chapter 7 trustee (the “Trustee”):

**Background**

1. Attached hereto as **Exhibit A** is the *Declaration of Gregory LaBove in Support of GOM’s Limited Objection to the Trustee’s Motion to Relinquish or Abandon Certain Federal Leases* [Docket No. 2341] (the “LaBove Declaration”). The LaBove Declaration supports the factual allegations set forth herein.

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<sup>1</sup> The debtors in these cases (collectively, the “Debtors”), along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

2. MLCJR LLC, *et al.* (collectively, the “Debtors”) were previously chapter 11 debtors in possession in these bankruptcy cases. The Court entered an order converting these cases to chapter 7 on February 28, 2024.

3. GOM is a creditor and party in interest herein. *See* LaBove Decl. at ¶ 4. Prior to the filing of the Debtors’ respective bankruptcy petitions, GOM and one or more of the Debtors were parties to numerous agreements relating to the joint ownership, development, and operation of certain offshore oil and gas properties. *Id.* On some properties, GOM was the operator and one of the Debtors owned a non-operating working interest. *Id.* On other properties, one of the Debtors was the operator and GOM owned a non-operating working interest. *Id.* GOM is also a predecessor-in-interest to the Debtors on certain properties, and a co-owner with certain Debtors on other properties. *Id.*

4. After notice and a hearing, the Court entered its *Order (A) Approving the Purchase and Sale Agreement with Natural Resources Worldwide, LLC, (B) Authorizing the Sale of Certain Assets of the Debtors Free and Clear of Liens, Claims, Encumbrances and Interests, (C) Authorizing the Assumption and Assignment of Certain Contracts and Leases, and (D) Granting Related Relief* on February 10, 2024 [Docket No. 1626] including the NRW PSA Amendment (collectively, the “NRW Sale Order”).<sup>2</sup> The NRW Sale Order is a final order. Pursuant to the terms of the NRW Sale Order, certain assets of the Debtors’ bankruptcy estates were sold to National Resources Worldwide, LLC (“NRW”).

5. Paragraph 47 of the NRW Sale Order contains provisions resolving the objections asserted by GOM to the sale of the subject assets to NRW, including that GOM shall be designated

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<sup>2</sup> *See* the NRW Sale Order and the *Notice of Filing Amendment to Purchase and Sale Agreement with Natural Resources Worldwide, LLC* [Docket No. 1642] (the “NRW PSA Amendment”).

as the operator of the Grand Isle 43 Field, along with the underlying leases and facilities, effective as of the Closing Date.<sup>3</sup> As contemplated by the NRW Sale Order, GOM has been approved by the appropriate governmental authorities to be the operator of the Grand Isle 43 Field and has been acting as the operator of that field for many months. *See* LaBove Decl. at ¶ 5. GOM generally owns 75% of the working interests in the Grand Isle 43 Field and NRW owns 25% of the working interests (after purchasing the Debtors' interests in the field). *Id.*

6. The Motion seeks authority for the Trustee to relinquish, or alternatively abandon, the Estates' interests, if any, in the oil and gas leases, Right of Way Easements (“ROWs”), and Right of Use Easements (“RUEs”) (collectively defined in the Motion as the “Federal Leases”) that the Debtors sold to NRW. With respect to the request to relinquish the Federal Leases, the Motion is based on the faulty premise that the Estates are “the sole record title holder of the Federal Leases” and the “Trustee has the sole authority to relinquish the Federal Leases here.” Motion at ¶ 35. To the contrary, GOM is a record title owner of an undivided interest in many of the Federal Leases (LaBove Decl. at ¶¶ 6 and 7), which as discussed below precludes the Trustee for unilaterally relinquishing those Federal Leases.

7. The NRW Sale Order provides that upon the Closing Date, “this Sale Order, the PSA, and other ancillary documents entered into or delivered in connection therewith shall be construed and shall constitute for any and all purposes a full and complete general assignment, conveyance and transfer to [NRW] of the Debtors' interest in the Acquired Assets.”<sup>4</sup> Thus, the

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<sup>3</sup> Unless otherwise defined herein, capitalized terms in this Objection shall have the meanings ascribed in the Motion or the NRW Sale Order.

<sup>4</sup> *See* NRW Sale Order at ¶ 9.

NRW Sale Order conveyed the Debtors' interest in the Acquired Assets to NRW, which includes the Debtors' interests in the Grand Isle 43 Field and other properties co-owned with GOM.<sup>5</sup>

8. Notwithstanding the consummation of the sale of the Acquired Assets to NRW pursuant to the terms of the NRW Sale Order (resulting in the Acquired Assets no longer being property of Debtors' bankruptcy estates), the proposed form of order submitted with the Motion [Docket No. 2341-1] requests authority for the Trustee to "relinquish," or alternatively "abandon," the Federal Leases sold to NRW, which are listed in Exhibit 1 thereto. As shown herein, GOM is a co-owner with NRW in some of the Federal Leases, GOM operates some of the Federal Leases, and GOM has other rights and interests in certain of the Federal Leases. In addition, the Federal Leases have been sold to NRW and are no longer property of the Debtors' bankruptcy estates. Thus, GOM's rights and interests will be adversely impacted by the granting of the Trustee's requested relief.

### **Limited Objections**

9. GOM asserts the following limited objections to the relief requested in the Trustee's Motion.

***a. The Trustee should not be permitted to Relinquish or Abandon Federal Leases that are no longer owned by the Debtors' estates.***

10. As set forth in the Motion, the Estates' interests in the Federal Leases have been sold and conveyed to NRW pursuant to the terms of the NRW Sale Order. *See* Docket No. 1626. GOM objects to the Relinquishment or Abandonment (as those terms are defined in the Motion) of the Federal Leases (as defined by the Motion) to the extent all or any portion of the Estates' interests in the Federal Leases have been sold to NRW and are no longer property of the Debtors'

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<sup>5</sup> The Motion also points out that paragraph 57(i) of the NRW Sale Order contains language providing that the assumption and assignment of specified rights and interest in federal oil and gas leases will be "ineffective" absent governmental consent. *See* Motion at ¶ 4.

bankruptcy estates. Simply put, the Trustee cannot Relinquish or Abandon assets that are not owned by the Debtors' estates. *See* 11 U.S.C. § 554(a) (providing that a trustee may abandon "any property of the estate...").

11. The proposed form of order attached to the Motion appears to seek Court approval for the Relinquishment or the Abandonment of the Federal Leases in their entirety, whether owned by the Debtors' estates or not, and without regard to GOM's record title interests, operating rights, and other interests in the Federal Leases. This requested relief should be denied as overly broad and in violation of 11 U.S.C. § 554(a).

***b. The Trustee should not be permitted to Relinquish or Abandon Federal Leases in which GOM owns a record title interest and/or that are critical to GOM's operations.***

12. Attached hereto as **Exhibit A-1** is a partial list of leases/ROWs/RUEs sold by the Debtors to NRW that the Trustee seeks to Relinquish or Abandon, and in which GOM owns a record title interest and/or that are critical to GOM's operations in the Eugene Island 361 Field. *See* LaBove Decl. at ¶ 6. First, GOM owns an undivided record title interest in portions of Lease 00310, which is part of a large offshore unit. *Id.* Second, the leases/ROWs/RUEs listed in Exhibit A-1 are necessary for GOM to operate and produce its Eugene Island 361 Field, and if said leases/ROWs/RUEs are Relinquished, as requested by the Motion, GOM will likely be forced to shut-in the Eugene Island 361 Field. *Id.* For example, RUE EI 353D is a platform Right of Use Easement that covers an offshore platform necessary to operate several wells in the Eugene Island 361 Field. *Id.* As another example, Right of Way Easements 7220 and 7221 are used by GOM to transport oil and gas from one platform to another within the Eugene Island 361 Field. *Id.* As a final example, federal leases 00310 and G04437 are unitized as part of a much larger offshore unit, and if one or both of those leases are relinquished, the continued viability of the entire unit, in which GOM owns an interest, will be jeopardized. *Id.*

13. Attached hereto as **Exhibit A-2** is a broader list of leases and ROWs sold by the Debtors to NRW and in which GOM owns a record title interest and/or holds operating rights. *See* LaBove Decl. at ¶ 7. The Trustee concedes that GOM owns record title interests and operating rights in said leases by stating as much in Exhibit 1 of the proposed order [Docket No. 2341-1]. Nevertheless, the Trustee seeks to Relinquish, or alternatively Abandon, the Debtors' Mere Legal Title (as defined in the Motion) in these leases and ROWs, without regard to the adverse impact of that requested relief on GOM Shelf and other third parties.

14. As noted by the Trustee, 30 CFR § 556.1101, provides, in pertinent part: “(a) A record title owner may relinquish a lease or an aliquot part of a lease if **all record title owners** of the lease or any aliquot part(s) of the lease file three original copies of the request to relinquish with BOEM on Form BOEM-0152, entitled, “Relinquishment of Federal Oil and Gas Leases.” Motion at ¶ 35 (emphasis added). The problem lies in the fact that the Estates do not hold 100% of the record title to all of the Federal Leases listed on Exhibit A-1 and Exhibit A-2. Simply put, the Trustee is precluded from seeking Relinquishment of the Federal Leases on Exhibits A-1 and A-2 because GOM, as a record title owner in those leases/ROWs/RUEs, does not consent to Relinquishment and will not join in any efforts to Relinquish said leases/ROWs/RUEs. *See* 30 CFR § 556.1101 (requiring **all record title owners** of the lease or any aliquot part(s) of the lease to join in the request to relinquish with BOEM) (emphasis added). For this reason alone, the Motion should be denied with respect to the Federal Leases on Exhibits A-1 and A-2.

15. GOM also objects to the relief sought by the Trustee because the Relinquishment or Abandonment of the Federal Leases listed on Exhibits A-1 and A-2 would adversely impact GOM's ownership in those assets and/or its ability to operate those leases or other leases. *See* LaBove Decl. at ¶¶ 6 and 7; *see also* ¶ 12, *supra*. For example, GOM operates the Grand Isle 43

Field in which it owns, generally speaking, 75% of the working interest and NRW owns a 25% non-operated working interest it acquired from the Debtors. *Id.* The Trustee concedes GOM's ownership interest and operating rights in the Grand Isle 43 Field. *See* Proposed Order, Exhibit 1 [Docket No. 2341-1]. ROW 9084 on Exhibit A-2, in which GOM owns an undivided 75% record title interest, is used by GOM to transport oil production from the Grand Isle 43 Field to shore. *See* LaBove Decl. at ¶ 7. ROW 5917 on Exhibit A-2, in which GOM owns 100% of the record title interest, is used by GOM to transport oil production from Main Pass 311 to a Sub Sea Tie-In in Main Pass 313. *Id.* Thus, GOM is justifiably concerned that a blanket Relinquishment or Abandonment of these assets by the Trustee may result in the federal government treating these leases and ROWs as terminated or cause the federal government to take some other action to impair GOM's rights, including GOM's right to operate the Grand Isle 43 Field and benefit from the production therefrom. *Id.*

16. If the Trustee is granted authority to Relinquish the Federal Leases (as set forth in 30 CFR § 556.1101), BOEM may treat such leases as terminated and no longer in effect, which is not accurate. To the contrary, the Federal Leases on Exhibits A-1 and A-2 remain in effect and are vital to GOM's ongoing operations of the Eugene Island 361 Field and the Grand Isle 43 Field. *See* LaBove Decl. at ¶¶ 6 and 7. If the Trustee is permitted to relinquish the leases/ROWs/RUEs on Exhibits A-1 and A-2, GOM will likely be required to shut-in, in whole or in part, the production from the Eugene Island 361 Field and the Grand Isle 43 Field, which would result in significant economic and operational harm to GOM. *Id.*

17. Subject to and without waiver of these objections, GOM is willing to engage with Trustee's counsel in an attempt to agree on language in the proposed order making it clear that the Trustee's Abandonment (but not Relinquishment) of the Estates' interests in the Federal Leases, if

any, shall not impact nor adversely affect GOM's ownership, operation or use of such assets in any way. Without such clarification, the proposed Abandonment of the leases and ROWs on Exhibits A-1 and A-2 could have a material adverse effect on GOM's rights and assets without its consent or receipt of adequate consideration, which would result in an involuntary and unconstitutional "taking" of GOM's property.

***c. The Trustee should not be permitted to Abandon Federal Leases with unresolved Incidents of Non-Compliance.***

18. Section 554 of the Bankruptcy Code precludes the Trustee from abandoning property of the Debtors' estates when doing so violates law "reasonably designed to protect the public health or safety from identified hazards." *Midlantic Nat'l Bank v. New Jersey Dep't of Env't Prot.*, 474 U.S. 494, 507 (1986). "The Bankruptcy Court does not have the power to authorize an abandonment without formulating conditions that will adequately protect the public's health and safety." *Id.* at 506-07. Thus, *Midlantic* limits the Trustee's ability to abandon assets when there exists imminent health, environmental, and safety risks. *Id.*

19. To the extent the Trustee is not granted authority to Relinquish the Federal Leases, the Trustee alternatively seeks authority to Abandon the Federal Leases. *See* Motion at 20 – 24. Upon information and belief, there are numerous uncured Incidents of Non-Compliance ("INCs") that have been issued by the U.S. Government relating to certain of the Federal Leases, which assert violations of federal environmental and safety laws. Upon further information and belief, the uncured INCs include several "red" INCs, which pose the greatest threatened imminent harm to human health, safety, or the environment. The Motion is silent, however, on the plan for remedying any outstanding INCs. The Motion is also silent regarding plans for ongoing maintenance and monitoring of the Federal Leases that the Trustee wishes to abandon.



20. Moreover, the Motion fails to address the “process” for abandoning each of the Federal Leases, including, among other things, (a) the current status of each particular lease/ROW/RUE (*e.g.*, has the particular property been shut-in, has decommissioning work begun and if so how far has it progressed, the status of any INCs, etc.); (b) to whom the Debtors intend to abandon each particular property; (c) when the transition of responsibility for each particular property is supposed to occur; and (d) whether any bonds are available to satisfy decommissioning costs relating to each particular property. At a minimum, the Trustee should provide this information *on a property-by-property basis* before any objection deadline or hearing is set on the abandonment of any particular property as the adequacy of the process and transition timeline for each property may be different.

21. Because this information has not been provided, it remains unclear whether a capable entity is prepared to timely take responsibility for the maintenance, monitoring and ultimate decommissioning of *each* property. Thus, the Motion is premature, and GOM reserves all rights to supplement its Objection once such information is provided.

#### **Reservation of Rights**

22. This Objection is submitted without prejudice to, and with full express reservation of, the rights of GOM to supplement and amend this Objection and to introduce evidence at any hearing related to this Objection, and to further object to subsequent requests for relief on any and all grounds.

**WHEREFORE**, GOM respectfully requests that the Court sustain these objections to the Motion. GOM also requests such other and further relief to which it may be justly entitled.

Respectfully submitted this 27th day of January 2025.

**GRAY REED**

By: /s/James J. Ormiston

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*Counsel to GOM Shelf, LLC*

**Certificate of Service**

The undersigned hereby certifies that on January 27, 2025, he caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties authorized to receive electronic notice in this case.

/s/James J. Ormiston

James J. Ormiston

# EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

MLCJR LLC, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)

) Case No. 23-90324 (CML)  
)

) (Jointly Administered)  
)

**DECLARATION OF GREGORY LABOVE IN SUPPORT OF GOM'S LIMITED  
OBJECTION TO THE TRUSTEE'S MOTION TO RELINQUISH OR ABANDON  
CERTAIN FEDERAL LEASES [DOCKET No. 2341]**

**THE STATE OF TEXAS**

§

§

**COUNTY OF HARRIS**

§

I, Gregory LaBove, pursuant to 28 U.S.C. § 1746, hereby declares that the following is true to the best of my knowledge, information, and belief:

1. My name is Gregory LaBove. I am over the age of eighteen and am fully competent to make this Declaration. I have never been convicted of a felony or crime of dishonesty or moral turpitude.

2. I am the Vice President of Land and Business Development of Commodore Offshore Operating LLC ("Commodore"). Commodore serves as the contract operator for GOM Shelf LLC ("GOM"), and I am authorized to submit this declaration in support of the *Limited Objection of GOM Shelf, LLC to the Trustee's Emergency Motion for Authority to (A) Relinquish*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors' address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

*Certain Federal Leases; (B) Abandon the Remaining Title to Certain Federal Leases; and (C) for Related Relief (the “Objection”).*

3. As Vice President of Land and Business Development for Commodore, I am familiar with GOM’s business, including its relationship with Debtors Cox Operating, L.L.C. (“Cox Operating”) and Cox Oil Offshore, L.L.C. (“Cox Offshore”) (together with Cox Operating, “Cox”). I have personal knowledge of the facts stated herein, or such facts are based on my review of GOM’s or Commodore’s records, operations, contracts with third-parties, including Cox, and the parties’ exploration and production of hydrocarbons in the Gulf of Mexico.

4. GOM is a creditor and party in interest herein. Prior to the filing of the Debtors’ respective bankruptcy petitions, GOM and one or more of the Debtors were parties to numerous agreements relating to the joint ownership, development, and operation of certain offshore oil and gas properties. On some properties, GOM was the operator and one of the Debtors owned a non-operating working interest. On other properties, one of the Debtors was the operator and GOM owned a non-operating working interest. GOM is also a predecessor-in-interest to the Debtors on certain properties, and a co-owner with certain Debtors on other properties.

5. As contemplated by the NRW Sale Order,<sup>2</sup> GOM has been approved by the appropriate governmental authorities to be the operator of the Grand Isle 43 Field and has been acting as the operator of that field for many months. GOM generally owns 75% of the working interests in the Grand Isle 43 Field and NRW owns 25% of the working interests (after purchasing the Debtors’ interests in the field).

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<sup>2</sup> Unless otherwise defined herein, capitalized terms in this declaration shall have the meanings ascribed in the Objection, the Motion, or the NRW Sale Order.


6. Attached hereto as **Exhibit A-1** is a partial list of oil and gas leases, Right of Way Easements (“**ROWs**”), and Right of Use Easements (“**RUEs**”) sold by the Debtors to NRW that the Trustee seeks to Relinquish, and in which GOM owns an interest and/or are critical to GOM’s operations. Specifically, the leases/ROWs/RUEs listed in Exhibit A-1 are necessary for GOM to operate and produce its Eugene Island 361 Field, and if said leases/ROWs/RUEs are Relinquished, as requested by the Motion, GOM will likely be forced to shut-in the Eugene Island 361 Field. For example, RUE EI 353D is a platform Right of Use Easement that covers an offshore platform needed to operate several wells in the Eugene Island 361 Field. As another example, Right of Way Easements 7220 and 7221 are used by GOM to transport oil and gas from one platform to another within the Eugene Island 361 Field. As a final example, federal leases 00310 and G04437 are unitized as part of a much larger offshore unit, and if one or both of those leases are relinquished, the continued viability of the entire unit, in which GOM owns an interest, will be jeopardized. If the Trustee is permitted to relinquish the leases/ROWs/RUEs on Exhibit A-1, GOM will likely be required to shut-in, in whole or in part, the production from the Eugene Island 361 Field, which would result in significant economic and operational harm to GOM.

7. Attached hereto as **Exhibit A-2** is a list of leases and ROWs sold by the Debtors to NRW and in which GOM owns a record title interest and/or holds operating rights. The Relinquishment or Abandonment of the leases and ROWs on Exhibit A-2 would adversely impact GOM’s ownership in those assets and/or its ability to operate those leases or other leases. For example, GOM operates the Grand Isle 43 Field in which it owns, generally speaking, 75% of the working interest and NRW owns a 25% non-operated working interest it acquired from the Debtors. ROW 9084 on Exhibit A-2 is used by GOM to transport oil production from the Grand Isle 43 Field to shore. ROW 5917 on Exhibit A-2 is used by GOM to transport oil production



from Main Pass 311 to a Sub Sea Tie-In in Main Pass 313. GOM is concerned that a blanket Relinquishment or Abandonment of these assets by the Trustee may result in the federal government treating these leases or ROWs as terminated or cause the federal government to take some other action to impair GOM's rights, including GOM's right to operate the Grand Isle 43 Field and benefit from the production therefrom.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, on this 27th day of January, 2025.



Gregory LaBove, Vice President of Land and  
Business Development of Commodore Offshore  
Operating LLC as contract operator and  
authorized agent of GOM Shelf LLC

# **EXHIBIT A-1**



**Tab 1 - If the Court allows the Trustee to unilaterally relinquish, GOM Shelf LLC will be harmed**

If the Court allows the Trustee to abandon/relinquish this group of assets, GOM Shelf will be impacted.  
 These items support: (i) EI 361 production and without them EI 361 will shut in. (ii) Lease 000310 and G04437 are Unitized. Relinquishing either will break the unit. Only one line shown for the 00310 lease but it covers several blocks.

**ROWS/RUEs**

<b>Authority Number</b>	<b>ROW/RUE</b>	<b>Asset</b>	<b>Description</b>
G30399	RUE	EI 353 D	Platform for several EI 361 GOM wells
G29644	ROW	7220	Oil from EI 353 D to EI 360 C
G29645	ROW	7221	Lift Gas from EI 360 C to EI 353 D

**Leases**

<b>Block</b>	<b>Lease</b>	<b>Status</b>	<b>Ownership Type</b>	<b>Ownership</b>	<b>Owner</b>	<b>Desc</b>
EI 360	G02323	PROD	Record Title	100.00%	Cox Oil Offshore, L.L.C.	All of Block, EI 360
MANY	00310	UNIT	Record Title A	100.00%	Cox Oil Offshore, L.L.C.	All Blocks, EXCLUDING Block 241, South Marsh Island Area, North Addition
			Record Title B	60.00%	GOM Shelf LLC	All of Block 241, South Marsh Island Area, North Addition
				40.00%	Cox Oil Offshore, L.L.C.	That portion of Block 236, South Marsh Island Area, North Addition, OCS Leasing Map, Louisiana Map No. 3D (see XY data)
			Record Title	100.00%	Cox Oil Offshore, L.L.C.	
SM 236	G04437	UNIT	Operating Rights 1	50.00%	JX Nippon Oil Exploration (U.S.A.) Limited	
				50.00%	BP Exploration & Production Inc.	Portion of Block 236, South Marsh Island Area, North Addition, INSO FAR AND ONLY INSO FAR AS the operating rights are located in the SW1/4SW1/4; SE1/4SW1/4; and that portion of the SW1/4SE1/4 and the SE1/4SE1/4 lying seaward of the OCS 310 lease line, and said operating rights further limited to those depths between the stratigraphic equivalent of the productive sand interval the top of which is seen at a depth of 9,640' in OCS-G 4270 Well No. C-1 and the bottom of which is seen at a depth of 11,291 in the OCS-G 4270 Well No. C-3.

# **EXHIBIT A-2**

Tab 2 - The Trustee can not unilaterally relinquish (GOM Shelf owns an interest) - but if allowed or the interest is abandoned, GOM will be impacted.

Authority Number	ROW/RUE	Asset	Description	Block	Lease	Status	Ownership Type	Ownership	Owner	Desc
G12304	ROW	9084	Oil from GI 43 to shore	EI 361	G02324	PROD	Record Title	12.35% GOM Shelf LLC	All of Block, EI 361	
G13466	ROW	5917	Oil from MP 311 to SSTI in MP 313				Operating Rights	87.65% Cox Oil Offshore, L.L.C.		
							Operating Rights	6.18% GOM Shelf LLC		
				GI 32	00174	UNIT	Record Title	87.65% Cox Oil Offshore, L.L.C.	All of Block 361, Eugene Island Area, South Addition, from 5,220' SSTVD to 99,999' SSTVD.	
							Record Title	6.18% Apache Shelf Exploration LLC		
							Record Title	75.00% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
				GI 39	00126	UNIT	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.	S1/2 of Block 32, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS).	
							Operating Rights 1	37.50% BP Exploration & Production Inc.		
							Operating Rights 1	18.75% Apache Shelf Exploration LLC		
							Operating Rights 2	37.50% GOM Shelf LLC		
							Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.		
							Operating Rights 2	37.50% Apache Shelf Exploration LLC		
				GI 39	00127	UNIT	Record Title	25.00% Cox Oil Offshore, L.L.C.	S1/2 of Block 32, Grand Isle Area, from 12,756' TVDSS to 18,000' subsea (TVDS).	
							Record Title	37.50% GOM Shelf LLC		
							Record Title	25.00% Apache Shelf Exploration LLC		
							Record Title	75.00% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		
				GI 40	00128	UNIT	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.	E1/2 of Block 39, Grand Isle Area from 18,000' feet TVDS to 99,999' TVDSS.	
							Operating Rights 1	37.50% BP Exploration & Production Inc.		
							Operating Rights 1	18.75% Apache Shelf Exploration LLC		
							Operating Rights 2	37.50% GOM Shelf LLC		
							Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.		
							Operating Rights 2	37.50% Apache Shelf Exploration LLC		
				GI 41	00129	UNIT	Record Title	25.00% Cox Oil Offshore, L.L.C.	W1/2 of Block 39, Grand Isle Area, from 12,256 feet SSTVD to 18,000 feet subsea (TVDS).	
							Record Title	75.00% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		
				GI 41	00129	UNIT	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.	All of Block 40, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS).	
							Operating Rights 1	37.50% BP Exploration & Production Inc.		
							Operating Rights 1	18.75% Apache Shelf Exploration LLC		
							Operating Rights 2	37.50% GOM Shelf LLC		
							Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.		
							Operating Rights 2	37.50% Apache Shelf Exploration LLC		
				GI 41	00129	UNIT	Record Title	25.00% Cox Oil Offshore, L.L.C.	All of Block 40, Grand Isle Area, 12,469' TVDSS to 18,000' TVD	
							Record Title	75.00% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		
				GI 41	00129	UNIT	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.	E1/2 of Block 41, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS).	
							Operating Rights 1	37.50% BP Exploration & Production Inc.		
							Operating Rights 1	18.75% Apache Shelf Exploration LLC		
							Operating Rights 2	37.50% GOM Shelf LLC		
							Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.		
							Operating Rights 2	37.50% Apache Shelf Exploration LLC		
				GI 41	00129	UNIT	Record Title	25.00% Cox Oil Offshore, L.L.C.	E1/2 of Block 41, Grand Isle Area, from 14,123' TVDSS to 18,000' subsea (TVDS)	
							Record Title	37.50% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		
							Record Title	25.00% Cox Oil Offshore, L.L.C.		
							Record Title	18.75% GOM Shelf LLC		

GI 41	00130	UNIT	Record Title	75.00% GOM Shelf LLC	W1/2, GI 41	W1/2 of Block 41, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS) to 99,999 feet subsea (TVDS).
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.		
				18.75% GOM Shelf LLC		
				25.00% Cox Oil Offshore, L.L.C.		
				37.50% BP Exploration & Production Inc.		
GI 42	00131	UNIT	Operating Rights 2	18.75% Apache Shelf Exploration LLC	W1/2 of Block 41, Grand Isle Area, from 14,123' SSTVD to 18,000 feet subsea (TVDS).	
				37.50% GOM Shelf LLC		
				25.00% Cox Oil Offshore, L.L.C.		
				37.50% Apache Shelf Exploration LLC		
				18.75% GOM Shelf LLC		
GI 43	00175	UNIT	Record Title	75.00% GOM Shelf LLC	All of Block, GI 42	All of Block 42, Grand Isle Area, from 12,504' SSTVD to 18,000' SSTVD.
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.		
				37.50% BP Exploration & Production Inc.		
			Operating Rights 2	18.75% Apache Shelf Exploration LLC		
				37.50% GOM Shelf LLC		
GI 44	00176	UNIT	Record Title	25.00% Cox Oil Offshore, L.L.C.	All of Block, GI 43	All of Block 43, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS) to 99,999 feet subsea (TVDS).
			Operating Rights 1	37.50% BP Exploration & Production Inc.		
				18.75% Apache Shelf Exploration LLC		
			Operating Rights 2	37.50% GOM Shelf LLC		
				25.00% Cox Oil Offshore, L.L.C.		
GI 46	00132	UNIT	Record Title	75.00% GOM Shelf LLC	N1/2, GI 44	N1/2 of Block 44, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS) to 99,999 feet subsea (TVDS).
			Operating Rights 1	18.75% Apache Shelf Exploration LLC		
				25.00% Cox Oil Offshore, L.L.C.		
			Operating Rights 2	37.50% BP Exploration & Production Inc.		
				18.75% Apache Shelf Exploration LLC		
GI 47	00133	UNIT	Record Title	75.00% GOM Shelf LLC	All of Block, GI 46	All of Block 46, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS) to 99,999 feet subsea (TVDS).
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.		
				18.75% GOM Shelf LLC		
			Operating Rights 2	37.50% BP Exploration & Production Inc.		
				18.75% Apache Shelf Exploration LLC		
GI 48	00134	UNIT	Record Title	75.00% GOM Shelf LLC	All of Block, GI 47	All of Block 47, Grand Isle Area, from 12,792' SSTVD to 18,000' subsea (TVDS).
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.		
				37.50% BP Exploration & Production Inc.		
			Operating Rights 2	18.75% Apache Shelf Exploration LLC		
				37.50% GOM Shelf LLC		
GI 48	00134	UNIT	Record Title	75.00% GOM Shelf LLC	All of Block, GI 48	All of Block 48, Grand Isle Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS) to 99,999 feet subsea (TVDS).
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.		
				37.50% BP Exploration & Production Inc.		
			Operating Rights 2	18.75% Apache Shelf Exploration LLC		
				37.50% GOM Shelf LLC		



GI 52	00177	UNIT	Record Title	75.00% GOM Shelf LLC	N1/2, GI 52
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.	
				100.00% GOM Shelf LLC	
			Operating Rights 2	37.50% BP Exploration & Production Inc. 25.00% Cox Oil Offshore, L.L.C. 18.75% GOM Shelf LLC 18.75% Apache Shelf Exploration LLC	
WD 67	00179	UNIT	Record Title	75.00% GOM Shelf LLC	S1/2, WD 67
				25.00% Cox Oil Offshore, L.L.C.	
				18.75% GOM Shelf LLC	
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	
WD 68	00180	UNIT	Operating Rights 2	37.50% GOM Shelf LLC	S1/2 of Block 67, West Delta Area, from 11,650' TVDSS to 18,000' subsea (TVDS)
				25.00% Cox Oil Offshore, L.L.C.	
				37.50% Apache Shelf Exploration LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 69	00181	UNIT	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	S1/2 of Block 68, West Delta Area, from 13,225' TVDSS to 18,000' subsea (TVDS)
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 70	00182	UNIT	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	All of Block, WD 69
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 71	00838	UNIT	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	All of Block 69, West Delta Area, from 13,102' TVDSS to 18,000' (TVDS)
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 94	00839	PROD	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	All of Block 70, West Delta Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS).
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 94	00839	PROD	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	All of Block 70, West Delta Area, from 13,182' TVDSS to 18,000' subsea (TVDS)
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 94	00839	PROD	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	All of Block 71, West Delta Area, INSO FAR AND ONLY INSO FAR as the said lease covers and affects depths below 18,000 feet subsea (TVDS).
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 94	00839	PROD	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	All of Block 71, West Delta Area, from 13,357' SSTVD to 18,000' SSTVD.
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	
WD 94	00839	PROD	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C. 37.50% BP Exploration & Production Inc. 18.75% Apache Shelf Exploration LLC	All of Block 94, West Delta Area, from 13,159' SSTVD to 99,999' SSTVD.
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
			Record Title	75.00% GOM Shelf LLC	

WD 95	G01497	PROD	Record Title	75.00% GOM Shelf LLC	All of Block, WD 95
			Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.	
				75.00% GOM Shelf LLC	
			Operating Rights 2	25.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
WD 96	G01498	PROD	Operating Rights 1	25.00% Cox Oil Offshore, L.L.C.	All of Block, WD 96
				75.00% GOM Shelf LLC	
			Operating Rights 2	25.00% BP Exploration & Production Inc.	
				75.00% Cox Oil Offshore, L.L.C.	
				37.50% GOM Shelf LLC	
MP 296	G01673	UNIT	Record Title	75.00% Cox Oil Offshore, L.L.C.	All of Block, West Delta Area, from 13,399' SSTVD to 18,000' SSTVD.
			Operating Rights 1	25.00% Apache Shelf Exploration LLC	
				37.50% GOM Shelf LLC	
			Operating Rights 2	50.00% EPL Oil & Gas, LLC	
				25.00% GOM Shelf LLC	
MP 311	G02213	PROD	Record Title	50.00% EPL Oil & Gas, LLC	All of Block, MP 296
			Operating Rights 1	33.33% Talos Resources LLC	
				16.67% Apache Shelf Exploration LLC	
			Operating Rights 2	50.00% EPL Oil & Gas, LLC	
				25.00% GOM Shelf LLC	
			Record Title	50.00% EPL Oil & Gas, LLC	All of Block, MP 311
			Operating Rights 1	33.33% Talos Resources LLC	
				16.67% Apache Shelf Exploration LLC	
			Operating Rights 2	50.00% EPL Oil & Gas, LLC	
				25.00% GOM Shelf LLC	
			Record Title	50.00% EPL Oil & Gas, LLC	All of Block, MP 311
			Operating Rights 1	33.33% Talos Resources LLC	
				16.67% Apache Shelf Exploration LLC	
			Operating Rights 2	50.00% EPL Oil & Gas, LLC	
				25.00% GOM Shelf LLC	
			Record Title	50.00% EPL Oil & Gas, LLC	All of Block, MP 311
			Operating Rights 1	33.33% Talos Resources LLC	
				16.67% Apache Shelf Exploration LLC	
			Operating Rights 2	50.00% EPL Oil & Gas, LLC	
				25.00% GOM Shelf LLC	
			Record Title	50.00% EPL Oil & Gas, LLC	All of Block, MP 311
			Operating Rights 1	33.33% Talos Resources LLC	
				16.67% Apache Shelf Exploration LLC	
			Operating Rights 2	50.00% EPL Oil & Gas, LLC	
				25.00% GOM Shelf LLC	